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By ECF

The Honorable Jennifer H. Rearden
United States District Court
500 Pearl Street
Southern District of New York
New York, New York 10007

Re: United States v. Sergey Shestakov, 23 Cr. 16 (JHR)

Dear Judge Rearden:

I represent Sergey Shestakov in the above-referenced matter and write to respectfully request that the Court grant Mr. Shestakov's motion to compel the government to produce records material to the preparation of the defense, which has been fully-briefed and pending before the Court since November 8, 2023. As the Court is aware, trial is scheduled to commence in just over seven weeks on August 6, 2024. We need these materials—which consist of core Rule 16 discovery materials—to prepare our defense. Not having those materials, or any decision from the Court, prejudices the defense and our ability prepare for trial.

Respectfully submitted,

/s/ Rita M. Glavin

Rita M. Glavin

Counsel for Defendant Sergey Shestakov